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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

vs.

DIGITAL LICENSING INC., (d/b/a “DEBT Box”) a Wyoming corporation; JASON R. ANDERSON, an individual; JACOB S. ANDERSON, an individual; SCHAD E. BRANNON, an individual; ROYDON B. NELSON, an individual; JAMES E. FRANKLIN, an individual; WESTERN OIL EXPLORATION COMPANY, INC., a Nevada corporation; RYAN BOWAN, an individual; IX GLOBAL, LLC, a Utah limited liability company; JOSEPH A. MARTINEZ, an individual; BENJAMIN F. DANIELS, an individual; MARK W. SCHULER, an individual; B & B INVESTMENT GROUP, LLC (d/b/a “CORE 1 CRYPTO”), a Utah limited liability company; TRAVIS A. FLAHERTY, an individual; ALTON O. PARKER, an individual; BW HOLDINGS LLC (d/b/a the “FAIR PROJECT”), a Utah limited liability company; BRENDAN J. STANGIS, an individual; and MATTHEW D. FRITZSCHE, an individual,

Defendants.

**STIPULATED MOTION FOR
LEAVE TO FILE UNDER SEAL
AN ACCOUNTING OF
DEFENDANT
BRENDAN J. STANGIS**

Case No. 2:23-cv-00482-RJS

The Honorable Robert J. Shelby

Pursuant to DUCivR 5-3(b)(2) and Federal Rule of Civil Procedure 5.2, the Securities and Exchange Commission (the “Commission”) and Defendant Brendan Stangis respectfully move the Court for leave for Mr. Stangis to file an accounting of his assets (the “Accounting”) under seal.

On August 7, 2023, the Court ordered Mr. Stangis to prepare the Accounting and deliver it to counsel for the Commission by August 14. The Court also ordered Mr. Stangis to simultaneously file the Accounting with the Court. (See ECF 33, pp. 13-14).

The parties file this Stipulated motion seeking leave for Mr. Stangis to file the Accounting under seal to protect his privacy.

For these reasons, the Commission and Mr. Stangis request that leave to file under seal be granted as set forth in the proposed order submitted concurrently herewith.

DATED August 15, 2023.

SECURITIES AND EXCHANGE COMMISSION

/s/ Casey R. Fronk

Casey R. Fronk (e signed with permission)
Michael E. Welsh
Attorneys for the SEC

/s/ Brent R. Baker

Brent R. Baker
Brennan J. Curtis
PARSONS BEHLE & LATIMER

Attorneys for Brendan J. Stangis

CERTIFICATE OF SERVICE

On this 15th day of August 2023, I hereby certify that I electronically filed a true and correct copy of the foregoing with the Clerk of the Court using the CM/ECF system, which sent notification and service to all counsel of record.

/s/ Brent R. Baker